

The Honorable Kymberly K. Evanson

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
EDUCATION, et al.,

Defendants.

NO. 2:25-cv-01228-KKE

DECLARATION OF DR. LAURA L.  
FEUEBORN

**DECLARATION OF DR. LAURA L. FEUERBORN**

I, Dr. Laura L. Feuerborn, declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct:

1. I am a Professor and Program Director of the Education Specialist (Ed.S.) School Psychology Program at the University of Washington Tacoma. I am over the age of 18 and have personal knowledge of all the facts stated herein, including knowledge based on my experience and information provided to me. If called as a witness, I could and would testify competently to the matters set forth below.

2. I submit this Declaration in support of the Plaintiff States' Motion for Preliminary Injunction.

**Background**

3. I have been faculty at the University of Washington Tacoma for 19 years, and before that, I was a practicing school psychologist. I received my Ph.D. in School Psychology from the University of Oregon in 2004.

4. The University of Washington Tacoma is an urban serving university. Its mission is preservation, advancement, and dissemination of knowledge, and its vision is to educate a diverse student body to become responsible global citizens and future leaders through a challenging learning environment informed by cutting-edge scholarship. Our shared values are integrity, excellence, collaboration, innovation, and respect.

5. I have collaborated on numerous projects focused on school discipline, behavior support systems, social emotional learning, and mental health at the University of Washington Tacoma. Currently, I am a Co-Principal Investigator on Project EXPAND, a U.S. Department of Education (Department) Mental Health Service Professional Demonstration Grant (MHSP). Since

my time as faculty at the University of Washington Tacoma, during both Democratic and prior Republican presidential administrations, I have worked on 23 funded projects related to social, emotional, and behavioral support systems.

6. This includes my role as a Co-Principal Investigator for Project EXPAND, Award No. S184X240153, which the Education Specialist (Ed.S.) School Psychology Program received as part of the Department's MHSP Office of Safe and Supportive Schools.

**The Department's Funding and Discontinuance of Project EXPAND**

7. The MHSP attracts candidates for school-based mental health professions, including school psychology, and provides training opportunities for students in rural and other high-need local educational agencies (LEAs) (also referred to as school districts). MHSP facilitates partnerships between high-needs school districts and institutions of higher education, allowing opportunities for practicum students and interns to obtain required clinical supervision and increase children and adolescents' access to school mental health services.

8. The Ed.S. School Psychology Program applied for a multi-year MHSP grant on May 23, 2024.

9. In its application, the Ed.S. program explained there is a significant and long-standing need for more school psychologists in our region. Washington is in the midst of a youth mental health crisis, and existing school-based support systems are not equipped to meet the growing need. Limited internship opportunities and the high cost of graduate education create significant barriers for aspiring professionals, stalling the pipeline of qualified candidates. Without Project EXPAND, the state will have even fewer resources to address the mental health needs of its students and families. To meet that year's MHSP program priorities, the Ed.S. program proposed the following goals for its MHSP project: (1) increase the number of school

psychologists trained in the Ed.S. School Psychology program who will enter the workforce in high-need districts; (2) enhance school psychologists' capacity to lead—and high-need schools' to implement effective and cutting-edge mental health practices; and (3) demonstrate a positive impact in mental health indicators among students in high-need districts. Project EXPAND prepares Ed.S. School Psychology students through an increased number of placements in high-need districts for the purpose of completing required practicum and internship to complete their degree and obtain a credential as a school-based mental health services provider. Project EXPAND's objectives are attained by way of three activity categories: (a) Ed.S. student financial support and other recruitment and retention enhancements, (b) strengthened support for high-need practicum and internship partners, and (c) Ed.S. curricular enhancements and professional development offerings for Ed.S. students and partnering high-need districts.

10. On October 17, 2024, the Department awarded the Ed.S. School Psychology Program an MHSP grant for Project EXPAND, Award No. S184X240153. The Grant Award Notification is attached as **Attachment A**. The performance period for this grant was January 1, 2025 through December 31, 2029, and authorized funding for the initial budget period of January 1, 2025, through December 31, 2025.

11. The Department issued a Grant Notification Award funding for this grant on October 17, 2024, in the amount of \$910,119. The current budget period started on January 1, 2025, and ends on December 31, 2025 (*see* Attachment A).

12. The Ed.S. School Psychology Program structured its budgets with the understanding that the Department would make annual continuation awards based on our Project EXPAND performance under the MHSP program through the remainder of the project performance period. The Ed.S. School Psychology Program also structured its budgets with the

understanding that, consistent with the project proposals, we would have several years to generate performance results and identify and build relationships with new sources of funding that would allow us to continue Project EXPAND following the end of the federally funded performance period.

13. Since the Department has awarded the Ed.S. School Psychology Program this grant just over five months ago, we have used the funds effectively to build partnerships with three high-need districts in our region and attain numerous project objectives. We have placed practicum and interns in all three districts, and all three districts have hired our recent graduates. We hired and mentored four graduate assistants, supported 10 students to attend a national school psychology conference and present research, and supported all participating students in membership dues to professional organizations (e.g., Washington State Association of School Psychologists) and attending their affiliated conference. We designed and offered two skills building workshops for all cohorts, and we held our first recruitment and mental health event on our campus. We formed an Ed.S. School Psychology registered student organization and held an end-of-the-year program event to celebrate our graduates. This event was attended by all three cohorts, alumni, and our district partners. Further, we offered cross-cohort mentorship opportunities (e.g., book study), hosted experts in our region in our courses, and planned a mental health event with a community partner.

14. In my experience, discontinuance of a project's funding is rare, and I have never had a project's funding discontinued or terminated. To my knowledge, prior to 2025, discontinuance or termination would only occur in cases of poor performance or misconduct, typically with prior notice and opportunities to respond and correct any underlying issues.

15. Nevertheless, on April 29, 2025, the Department sent notice that the Ed.S. School Psychology Program's MHSP award would be discontinued at the end of the grant's current budget period, which is December 31, 2025. Given that the Department originally approved this grant's performance period through December 31, 2029, the University of Washington Tacoma faces a loss of \$3,868,802 in prospective funding, including \$934,667 that it had expected to receive for the upcoming 2025-26 calendar year in January. The Department's discontinuation notice is attached as **Attachment B**.

16. The notice came without any previous process or communication about the discontinuance from the Department. It purported to discontinue the grant based on 34 C.F.R. § 75.253(a)(5) and (f)(1). These regulations allow the Department to not continue a grant if it determines that continuation of the project is not in "the best interest of the Federal Government." 34 C.F.R. § 75.253(a)(5); 34 C.F.R. § 75.253(f)(1). In making this determination, the Department limited its considerations to "any relevant information regarding grantees' performance." 34 C.F.R. § 75.253(b). However, this notice failed to cite anything regarding the Ed.S. School Psychology Program's performance.

17. Rather it "determined that the grant specified above provides funding for programs that reflect the prior Administration's priorities and policy preferences and conflict with those of the current Administration." It then went on in boilerplate fashion to list a mishmash of reasons, claiming the programs: "violate the letter or purpose of Federal civil rights law; conflict with the Department's policy of prioritizing merit, fairness, and excellence in education; undermine the well-being of the students these programs are intended to help; or constitute an inappropriate use of federal funds." Based on this boilerplate language, the Ed.S. School Psychology Program has

no way of knowing which reason(s) applied as the Department's basis for discontinuing the MHSP grant for Project EXPAND.

**Harms from the Department's Decision to Discontinue the Ed.S. School Psychology Program's Grant**

18. The discontinuance of the Ed.S. School Psychology Program's MHSP grant will end Project EXPAND.

19. Although Ed.S. can still access funding through the end of our current budget period on December 31, 2025, the Ed.S. program is already experiencing the harmful effects of this discontinuance. The loss of funding has negatively impacted our ability to recruit students as the financial support provided by the grant is gone, and we are unable to admit the full number of students into our program as planned. Of those we were able to admit, six have declined acceptance to date. Additionally, the partnerships with local "high needs" school districts have been cut short and the work planned for the full 2025–26 academic school year must end December 31, 2025. Our budget period being a calendar year and not a full school year has introduced even more challenges, leaving us unable to implement the activities we had planned around a school and academic year (e.g., financial support for the internship year, year of support for our graduate assistantships).

20. This discontinuation has removed planned training and financial support for our partner district supervisors and has caused strain on our relationships with our graduate students along with our district and community partners. We invested substantial resources to create effective partnerships and the necessary conditions for a successful five-year project—only to receive a discontinuance notice four months into the project. My Co-Principal Investigator and I spent hundreds of hours meeting with representatives from our district and community partners to identify priorities, align project practices with school and community needs, and identify grant

participants. Project EXPAND planned to put 8-10 representatives from our partner school districts, local tribes, community housing and health care agencies, and families on the advisory board. Due to the discontinuance, Project EXPAND can no longer move forward with the advisory board.

21. The impact of this disruption is exacerbated by the fact that our program is a new degree program with only four years into a three-year program. We are in the process of creating a positive reputation in our communities with productive working relationships, and now, this discontinuance has harmed these relationships and has created frustration, skepticism, and confusion. Since this discontinuance, district and community partners have deprioritized our project, and we are experiencing absences in project meetings amongst district and community leaders, resistance to sign MOUs, and cancelations of planned events.

22. Moreover, if the Department does not rescind its discontinuation decision, our institution will not receive the full awarded funds, our district partners will not receive the funds to subsidize and support fieldwork and professional development, our community agencies will not receive support for our community outreach events, and our graduate students will not receive key financial supports such as tuition stipends and program costs and fees. These costs include background checks, national exams, mandated child abuse prevention training, transportation, and childcare. Additionally, the Ed.S. program would not receive the funds for four graduate assistantships that include full tuition and provide memberships for professional organizations and engagement in research presentations at national conferences. Ending Project EXPAND will stall the growth of Washington's school psychology workforce, deepening an already critical shortage. Currently, school districts face significant challenges in providing quality field experiences for future school psychologists, and Project EXPAND is set to subsidize internship placements and

provide stipends to field supervisors. Without this funding, districts lose both the financial incentive and systematic support needed to maintain robust supervision programs in a region where internship opportunities are already scarce. Our partner districts will lose access to comprehensive professional development resources that enhance the quality of mental health services. Without Project EXPAND's systematic effort to 'expand' and elevate the school psychologist role, districts will continue operating under a narrow service model that limits professionals to assessment-focused duties. This prevents school psychologists from leading schoolwide prevention initiatives, engaging in meaningful consultation, and providing comprehensive interventions that could more effectively address student and family mental health needs. With reduced numbers of school psychologists in our schools, fewer school psychologists will be available to provide necessary mental health services for children and youth. Fewer school psychologists will be available during mental health emergencies, leaving students without timely support. Failing to address student mental health early leads to higher social and economic costs, from untreated mental health conditions to reduced educational outcomes and delayed access to care. Ending Project EXPAND leaves school districts less prepared and students less supported. Learning disabilities, behavioral concerns, and mental health conditions may go undiagnosed and untreated, especially during early stages when intervention is most effective. Unaddressed mental health needs can hinder learning, resulting in poor academic performance, chronic absenteeism, higher dropout rates, and lower graduation rates. Families will miss out on community events that promote connection, awareness, and mental health.

23. In addition, we are forced to terminate the role of Project Coordinator at the end of funding. With the shortened time left in this position, our Project Coordinator is forced to search for more viable employment. Thus, we must plan for his early exit and the unlikelihood that he

could be replaced on such an abbreviated timeframe. That work will fall on the Project Co-Principal Investigators. We also lose the funding and work of four Graduate Research Assistants. Graduate students were planning to apply for these positions and were anticipating the financial support for research, professional engagement, and continuing their degree in this program.

24. There is no way to recover lost time or restore continuity once disrupted, and staff who depart will take their training and expertise with them, requiring new investment in recruitment, hiring, and training.

25. Even if the Department were to re-bid MHSP funds, and the Ed.S. School Psychology Program were to receive a new grant award, the harm would already be done. The initial funding allowed us to begin the work of building the infrastructure for establishing relationships to improve and increase access to the mental health services for children and youth in our region. We worked with our three district partners to onboard them with our project and to secure agreements with their school personnel to join us in this endeavor. When funding was cut so early in the five-year process, it severed these efforts. Future efforts must begin with rebuilding of trust that was lost when the grant was discontinued so early in the process.

### **Conclusion**

26. The discontinuances of University of Washington Tacoma's MHSP grant undermines our mission to preserve, advance, and disseminate knowledge, and its vision to educate a diverse student body to become responsible global citizens and future leaders through a challenging learning environment informed by cutting-edge scholarship. The discontinuance also undermines the Department's "mission to ensure equal access to education and to promote educational excellence throughout the Nation." 20 U.S.C. § 1228a(a). These discontinuances make it harder to train and secure talent and to adequately train providers so that our children may have

access to modernized mental health services. To meet budgetary deadlines, the Ed.S. program and its partners are making difficult decisions in the next few weeks and are already in the process of cutting short staff positions that support this Program and informing graduate students that they have lost significant tuition assistance. These harms are ongoing and will be irreparable if they are not stopped.

27. On May 22, 2025, the Ed.S. School Psychology Program submitted a request for reconsideration to the Department. On June 17, 2025, Ed.S. withdrew this request for reconsideration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 27th day of June 2025, in Seattle, Washington.

*Laura Feuerborn*

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LAURA L. FEUERBORN, Ph.D., NCSP  
Professor, Ed.S. School Psychology Program  
Director  
University of Washington Tacoma